

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
RECLAIM THE RECORDS, *et. al.*,

Plaintiffs,

- against -

UNITED STATES DEPARTMENT OF STATE,

Defendants.  
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**NOTICE OF MOTION TO  
WITHDRAWAL  
AS COUNSEL**

23-cv-01529 (VEC)

**PLEASE TAKE NOTICE** that, pursuant to Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Jeffrey F. Kinkle, request the withdrawal of my appearance as counsel for Plaintiffs, and further request removal from the Court's electronic filing notification system for this action. After December 15, 2023, I will no longer be employed by Beldock Levine & Hoffman LLP. Beldock Levine & Hoffman LLP will remain counsel of record for the Plaintiffs in this action.

Dated: New York, New York  
December 15, 2023

By: /s/ Jeffrey F. Kinkle  
Jeffrey F. Kinkle

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